

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

CRESTMARK, a division of METABANK,  
N.A.,

Plaintiff,

-against-

TELEESCROW, INC.,

Defendant.

22 Civ. 385 (LGS)

**STIPULATION AND ORDER**

Plaintiff Crestmark, a division of MetaBank, N.A. (“Crestmark”) and Defendant Teleescrow, Inc. (“Teleescrow,” and together with Crestmark, the “Parties”) by and through their undersigned counsel hereby stipulate and agree that:

**WHEREAS**, Teleescrow’s answer to Crestmark’s complaint was due on February 8, 2022;

**WHEREAS**, Teleescrow was ordered to produce the name(s) of every bank, financial institution, or financial services company that holds any funds on behalf of Teleescrow to Crestmark’s counsel on or before February 5, 2022 at 3:15pm (*see* Dkt No. 27); and,

**WHEREAS**, Teleescrow was ordered to produce the documents set forth in Paragraph 27 of the Declaration of Christine B. Cesare (*see* Dkt. No. 27) on or before February 8, 2022;

**WHEREAS**, new counsel for Teleescrow has requested a brief extension of the applicable dates set forth above;

**NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED THAT:**

1. Unless otherwise agreed to by the Parties through their respective counsel, Teleescrow will be required to do the following:

- a) Answer Crestmark’s complaint, on or before February 16, 2022;

- b) Provide the name(s) of every bank, financial institution, or financial services company that holds any funds on behalf of Teleescrow to Crestmark's counsel, on or before February 16, 2022, via email, to [cbcesare@bclplaw.com](mailto:cbcesare@bclplaw.com);
- c) Produce the documents set forth in Paragraph 27 of the Declaration of Christine B. Cesare (see Dkt. No 27), on or before February 16, 2022; and,
- d) Produce Teleescrow's Chief Executive Officer, Eillien Cabrera, at 10:00am for a deposition at the offices of Bryan Cave Leighton Paisner LLP, located 1290 Avenue of the Americas, New York, NY 10104 (or in a remote manner, as the Parties may so agree), on February 22, 2022.

Dated: February 9, 2022  
New York, New York

Respectfully submitted,

**BRYAN CAVE LEIGHTON PAISNER LLP**

/s/ Christine B. Cesare

Christine B. Cesare, Esq. (CC-1967)  
Jason J. DeJonker (*pro hac vice* to be filed)  
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*Attorneys for Plaintiff*

Respectfully submitted,

**OFFIT KURMAN**

/s/ Lucas Andrew Markowitz

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*Attorneys for Defendant*

**SO ORDERED:**

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Honorable. Lorna G. Schofield  
United States District Judge